

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

LEK SECURITIES CORPORATION,  
SAMUEL LEK,  
VALI MANAGEMENT PARTNERS dba  
AVALON FA LTD,  
NATHAN FAYYER, and  
SERGEY PUSTELNIK a/k/a SERGE  
PUSTELNIK,

Defendants.

CASE NO. 17-CV-1789 (DLC)

**NOTICE OF PLAINTIFF'S MOTION FOR  
JUDGMENT INCLUDING REMEDIES  
AGAINST DEFENDANTS AVALON,  
FAYYER AND PUSTELNIK**

PLEASE TAKE NOTICE that plaintiff Securities and Exchange Commission ("SEC") hereby respectfully moves this Court to enter final judgment on the jury verdict rendered in this case, and to include remedies of disgorgement of ill-gotten gains, civil money penalties and injunctive relief, and such other relief as may be appropriate, against Defendants Vali Management Partners dba Avalon FA Ltd, Nathan Fayyer and Serge Pustelnik. In support of its Motion, the SEC relies upon the supporting Memorandum of Law, the declaration of David J. Gottesman dated December 20, 2019, and the exhibits thereto, all filed herewith.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's Order dated November 12, 2019 (ECF No. 528), Defendants shall serve opposing papers, if any, no later than

January 24, 2020, and the SEC shall serve reply papers, if any, no later than February 7, 2020.

Dated: December 20, 2019

Respectfully submitted,

/s/ David J. Gottesman

David J. Gottesman

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U.S. Securities and Exchange Commission

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 20, 2019, a true and correct copy of the above document was served on all counsel of record by filing this document using the CM/ECF system.

/s/ David J. Gottesman